

HSD

HIGHLY SENSITIVE DOCUMENT

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

21-MJ-2090-MBB-MTS

UNDER SEAL

VLADISLAV DMITRIYEVICH KLYUSHIN,
a/k/a VLADISLAV KLIUSHIN,
IVAN SERGEYEVICH ERMAKOV,
a/k/a IVAN YERMAKOV,
IGOR SERGEEVICH SLADKOV,
MIKAIL VLADIMIROVICH IRZAK,
a/k/a MIKKA IRZAK, AND
NIKOLAI MIKHAYLOVICH RUMIANTCEV,
a/k/a NIKOLAY RUMYANTSEV

DOCKETED

MOTION TO SEAL AND TO DESIGNATE AS HIGHLY SENSITIVE DOCUMENTS

The United States of America respectfully moves this Court to:

1. seal the complaint, supporting affidavit, arrest warrants, this motion, any ruling on this motion, and all related orders and paperwork until further order of this Court, except that the government may disclose the complaint, supporting affidavit, and arrest warrants as necessary to effectuate the overseas arrest, detention, or extradition of any of the defendants; and

2. that the Court designate all of these documents, pursuant to the Court's Standing Order 21-1 (Jan. 26, 2021), as Highly Sensitive Documents that will not reside on the Court's electronic docket.

In support of this motion, the government states that the public disclosure of any of these materials at this juncture could jeopardize the government's ongoing investigation in this case, including its ability to arrest the defendants, and that, for the reasons stated in more fully in the affidavit in support of the complaint, the identity and activities of the defendants create a high

March 20, 2021. Altered.
Harrison B. Bowler, USMS

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risk that the storage of any of these documents on the Court's electronic docket will result in disclosure through unauthorized access to the Court's computer network.

The United States further moves pursuant to General Order 06-05 that the United States Attorney, through undersigned counsel, be provided copies of all sealed documents which the United States Attorney has filed in this matter.

Respectfully submitted,

NATHANIEL R. MENDELL
Acting United States Attorney

By: /s/Seth B. Kosto
SETH B. KOSTO
STEPHEN E. FRANK
Assistant U.S. Attorneys

Date: March 21, 2021